

UNITED STATES DISTRICT COURT
for the
Southern District of Ohio

In the Matter of the Search of
 UNITED STATES PRIORITY MAIL EXPRESS PARCEL EJ 485 324 527 US)
 485 324 527 US) Case No. 2:21-mj-293
)
)
)

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property

UNITED STATES PRIORITY MAIL EXPRESS PARCEL EJ 485 324 527 US

located in the Southern District of Ohio, there is now concealed (*identify the person or describe the property to be seized*):

A quantity of a controlled substance and/or proceeds which are evidence thereof, and/or contraband, in violation of Title 21, United States Code, Sections 841(a)(1), 843(b), and 846.

The basis for the search under Fed. R. Crim. P. 41(c) is (*check one or more*):

- evidence of a crime;
- contraband, fruits of crime, or other items illegally possessed;
- property designed for use, intended for use, or used in committing a crime;
- a person to be arrested or a person who is unlawfully restrained.

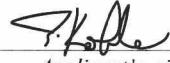
The search is related to a violation of:

Code Section	Offense Description
21 U.S.C. 841(a)(1)	Possession with intent to distribute a controlled substance
21 U.S.C. 843(b)	Prohibited use of a communication center (U.S. Mail)
21 U.S.C. 846	Conspiracy to possess with intent to distribute a controlled substance

The application is based on these facts:

As set forth in the attached Affidavit of Postal Inspector Justin D. Koble, incorporated herein by reference.

- Continued on the attached sheet.
- Delayed notice of 30 days (give exact ending date if more than 30 days: May 26, 2021) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.


Applicant's signature

Justin D. Koble, U.S. Postal Inspector

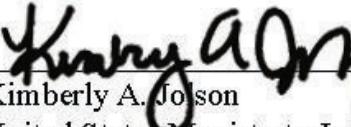
Printed name and title

Sworn to before me and signed in my presence.

April 26, 2021

Date: _____

City and state: Columbus, Ohio


Kimberly A. Jolson
United States Magistrate Judge



**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

**IN THE MATTER OF THE OPENING)
AND SEARCH OF:) CASE NO.
)
UNITED STATES PRIORITY MAIL) MAGISTRATE
EXPRESS PARCEL EJ 485 324 527 US)**

**AFFIDAVIT IN SUPPORT OF AN APPLICATION
UNDER RULE 41 FOR A WARRANT TO SEARCH AND SEIZE**

I, Justin D. Koble, being duly sworn, do hereby state the following:

INTRODUCTION AND AGENT BACKGROUND

1. I am a United States Postal Inspector with the United States Postal Inspection Service (“USPIS”) and have been so employed since July 2014. I am currently assigned to the Narcotics and Money Laundering Team at the USPIS’s Columbus, Ohio field office. In this capacity, I am responsible for investigating the illegal use of the United States Mails for the purpose of transporting controlled substances such as methamphetamine, heroin, fentanyl, fentanyl-related analogs, cocaine, and other controlled substances, in violation of Title 21, United States Code, Sections 841(a)(1) (manufacturing, distribution, or possession with the intent to manufacture or distribute a controlled substance), 843(b) (unlawful use of a communication facility in the commission of a crime), and 846 (drug conspiracy). In addition, I am responsible for investigating possible violations of 18 U.S.C. §§ 1956 and 1957 (money laundering). Prior to my assignment as a Postal Inspector, from January 2007 through June 2014, I was employed as a state law enforcement officer in the State of Florida. As a state law enforcement officer for the State of Florida, I conducted numerous investigations involving the possession, sale, and manufacture of narcotics.

2. I have been involved in the investigation and discovery of drug contraband and drug proceeds on multiple occasions. I have personally been the affiant for search warrants which have resulted in the discovery of controlled substances and drug proceeds. My current assignment to the Columbus Processing and Distribution Center (“P&DC”) involves investigating the use of the U.S. Mails by drug traffickers, in which established drug package profiles, surveillance, and drug detection dogs, among other investigative tools, are utilized.

3. Experience and drug trafficking intelligence have demonstrated that Priority Mail and Priority Mail Express are commonly used to transport drugs and drug proceeds because of their reliability and the time pressures they place on law enforcement agents to execute a successful controlled delivery.

4. This affidavit is made in support of an application under Rule 41 of Federal Rules of Criminal Procedure, for a warrant to search for and seize evidence, instrumentalities, contraband, and fruits of violations of Title 21, United States Code, Sections 841(a)(1) (manufacturing, distribution, or possession with the intent to manufacture or distribute a controlled substance), 843(b) (unlawful use of a communication facility in the commission of a crime), 846 (drug conspiracy), and of Title 18, United States Code, Sections 1716 (mailing injurious material) from the United States Priority Mail Express parcel bearing United States Postal Service (“USPS”) tracking number EJ 485 324 527 US (hereinafter the “SUBJECT PARCEL”). The search would be covert and consist of opening the SUBJECT PARCEL, viewing and photographing the contents, and closing the SUBJECT PARCEL.

5. The facts set forth in this affidavit are based on my personal knowledge, knowledge obtained during my participation in this investigation, knowledge obtained from other individuals, review of records related to this investigation, communications with others who have

personal knowledge of the events and circumstances described herein, and information gained through my training and experience. Because this affidavit is submitted for the limited purpose of establishing probable cause in support of the application for a search warrant, this affidavit does not set forth each and every fact learned by me during the course of this investigation.

SUBJECT PARCEL

6. On or about April 23, 2021, USPIS interdiction personnel in Columbus, Ohio interdicted the SUBJECT PARCEL at the USPS P&DC. The SUBJECT PARCEL is addressed to “Maria Zatarey, 11733 Cricket Dr., Bloomington, CA 92316,” with a return address of Nkechi Ojibe, 3072 Niagara Ct. East, Cols, Ohio 43227.” The SUBJECT PARCEL is a white USPS Priority Mail Express cardboard box measuring approximately 12” x 3.5” x 14” and weighing approximately 3 pounds, 3 ounces. The SUBJECT PARCEL was mailed from Columbus, Ohio 43218 on or about April 23, 2021.

PROBABLE CAUSE

7. Among the characteristics of the drug profile possessed by the SUBJECT PARCEL is the “source state” origination of the parcel, as well as the particular destination of the SUBJECT PARCEL.

8. Regarding the source state, on or about April 25, 2021, checks of USPS, law enforcement, and open-source electronic databases were conducted to determine the validity of the return information contained on the SUBJECT PARCEL. The return address, 3072 Niagara Ct, East, was determined to be a valid address in the 43227 zip code. However, the name “Nkechi Ojibe” was not found to be associated with this address. Your affiant is aware, based upon training and experience, that names found not to be associated with addresses and destined for California can be one indicator of a package containing illegal narcotics proceeds or other

contraband.

9. More to the above point, Your affiant further submits that the destination of the SUBJECT PARCEL bears on the issue of probable cause here. Regarding the destination state, US Postal Inspectors, special agents of the Drug Enforcement Administration (DEA), and other intelligence sources have identified California as a source state for illegal drugs flowing into Central Ohio and a destination state for the proceeds from the sale of these illegal drugs. That is, on or about April 25, 2021, checks of USPS, law enforcement, and open-source electronic databases were conducted to determine the validity of the destination information contained on the SUBJECT PARCEL. The destination address, 11733 Cricket Dr, was found to be a valid address in the 92316 zip code. However, the name indicated on the parcel, "Maria Zataray," was not found to be associated with the address. It is noted Bloomington, California is geographically in close proximity to the mailing locations of the parcels mailed from California to Ohio that are further discussed below. Based on the information included in this affidavit, Your affiant submits that there is probable cause to believe that the SUBJECT PARCEL, which was destined for California, contained narcotics proceeds.

10. Regarding both the above-described return and destination addresses, I know through training and experience that shippers of drugs and drug proceeds will often list a false or non-existent return address, or use a valid return address with a false sender's name, no name, or the address of a multi-unit building without indicating an apartment or suite number, to reduce the possibility of identification and apprehension by law enforcement. Although a valid recipient's address is necessary to permit the delivery of such packages, a false recipient's name is often used, for the same reasons.

11. On or about April 26, 2021, surveillance video was obtained from the Columbus,

Ohio 43218 Post Office showing the mailing of the SUBJECT PARCEL. The mailer of the parcel was determined to be Keith JAMES (“JAMES”). As discussed below, JAMES is known to law enforcement and is the target of an ongoing investigation into a drug trafficking organization (“DTO”) that utilizes the US Mail for the transportation of controlled substances. Based on Your affiant’s training and experience, it is believed this DTO also utilizes the US Mail for the transportation of the proceeds from the sale of these controlled substances back to California.

12. Further investigation has shown that the SUBJECT PARCEL is related to five additional suspect packages that have been mailed within the last six weeks.

13. **Related package 1:** Your affiant is aware that, in or around March of 2021, US Postal Inspectors in Newark, New Jersey interdicted the USPS Priority Mail Express parcel bearing USPS tracking number EJ 086 559 077 US (hereinafter the “New Jersey Seized Parcel”). The New Jersey Seized Parcel was addressed to “Carlos Matos, 269 Sherman St, Passaic, New Jersey 07055” with a return address of “Jose Matos, 10824 Mint Leaf Way, Fontana, CA 92337.” On or about March 12, 2021, a federal search warrant was executed on the New Jersey Seized Parcel resulting in the seizure of approximately three kilograms of suspected fentanyl. Relevant here, the mailing box used for the New Jersey Seized Parcel is a brown, square UPS mailing box similar to the box used for the mailing of related package 5, which is described below. As explained below, further investigation indicated additional connection points between the related packages, and ultimately the SUBJECT PARCEL.

14. **Related package 2:** During the course of the investigation into the New Jersey Seized Parcel, US Postal Inspectors identified, among other parcels, the USPS Priority Mail Express parcel bearing USPS tracking number EJ 086 559 050 US (hereinafter the “944 Ohio

Ave Parcel #1"). Retail USPS Priority Mail Express labels are produced in a predictable sequence. The first two characters are letters followed by nine numbers and ending with the letters "US." Of the nine numbers, eight are in numerical order with the last number being a check digit used internally by the USPS to verify the authenticity of the mailing label. The USPS Priority Mail Express label used in the mailing of the New Jersey Seized Parcel is two labels out of sequence from the above-identified 944 Ohio Ave Parcel #1. Based on my training and experience, I know shippers of controlled substances will often take multiple USPS Priority Mail Express labels, which are readily available at USPS retail locations, for future mailings. This allows the shipper to fill out the label prior to entering the post office and minimize their time in the post office and contact with USPS employees. Further, the 944 Ohio Ave Parcel #1 was determined to have been mailed on the same day as the New Jersey Seized Parcel from a USPS location approximately nine minutes away. Based on the above, including the location of the USPS locations and the close connection between the USPS Priority Mail Express labels, Your affiant respectfully submits that there is a strong likelihood that the New Jersey Seized Parcel and the 944 Ohio Ave Parcel #1 were mailed by the same person or organization.

15. **Related package 3:** Upon further review of the label sequence from the New Jersey Seized Parcel, an additional parcel, USPS Priority Mail Express parcel EJ 086 559 001 US (hereinafter the "2291 Pontiac St Parcel") was identified. The 2291 Pontiac St Parcel was found to be addressed to "Roxy Dunes, 2291 Pontiac St, Colubus [sic], Ohio 43211," with a return address of "Kenny Dunes, 317 C. Street, Ontario, CA 91762." The 2291 Pontiac St Parcel was found to be seven labels out of sequence with the New Jersey Seized Parcel and was mailed from Ontario, CA 91762 on or about February 16, 2021. Again, based on the above, Your affiant respectfully submits that there is a strong likelihood that the New Jersey Seized Parcel

and the 2291 Pontiac St Parcel were mailed by the same person or organization.

16. **Related package 4:** On or about April 9, 2021, US Postal Inspectors in Columbus, Ohio identified the USPS Priority Mail Express parcel bearing USPS tracking number EJ 482 201 210 US (hereinafter the “944 S. Ohio Ave Parcel #2”). The 944 S. Ohio Ave Parcel #2 was addressed to “Loring Allen, 944 S. Ohio Ave, Columbus Ohio 43206” with a return address of “Jose Delgado, 6559 Summersville Pl., Highland, CA 92346.”

17. On or about April 12, 2021, law enforcement conducted surveillance of the delivery of this fourth package related to the SUBJECT PARCEL, 944 S. Ohio Ave Parcel #2. Following delivery, an unknown individual was observed grabbing the 944 S. Ohio Ave Parcel #2 parcel off of the door stoop where it was delivered, running with the parcel to a nearby alley, and throwing the 944 S. Ohio Ave Parcel #2 parcel inside of a moving black Dodge Ram operated by an unknown black male. Based upon training and experience, Your affiant is aware that such conduct is both unusual and indicative of narcotics trafficking. Surveillance units observed the unknown black male then proceed to meet with a white Jeep Cherokee rental vehicle known to be rented JAMES. Law enforcement observed the unknown black male hand the parcel to JAMES.

18. **Related package 5:** On or about April 15, 2021, US Postal Inspectors in Columbus, Ohio identified the USPS Priority Mail Express parcel bearing USPS tracking number 9481 7111 0803 6801 4995 21 (hereinafter the “2291 Pontiac St Parcel #2”). The 2291 Pontiac St Parcel #2 was addressed to “Lori Allen, 2291 Pontiac St, Columbus, OH 43211-2049” with a return address of “[J]ose Delgado, 6745 Grove Ave, Highland, CA 92346.” The 2291 Pontiac St Parcel #2 was mailed from San Bernardino, CA on or about April 14, 2021, and weighed approximately 5 pounds 8 ounces.

19. After identifying the 2291 Pontiac St Parcel #2 through the USPS system, on or about April 16, 2021, law enforcement attempted to conduct surveillance of the delivery of the 2291 Pontiac St Parcel #2. A US Postal Inspector, acting in an undercover capacity, attempted to deliver the 2291 Pontiac St Parcel #2 to the residence located at 2291 Pontiac St; however, the female who answered the door refused to take delivery of the 2291 Pontiac St Parcel #2. A short time later, while debriefing at a nearby location, law enforcement observed JAMES drive past and park nearby. Based on training and experience, it is believed by law enforcement that JAMES was conducting counter surveillance.

20. On or about April 21, 2021, a federal search warrant for the 2291 Pontiac St Parcel #2 was signed by the Honorable Kimberly A. Jolson, United States Magistrate Judge for the Southern District of Ohio. The search warrant was executed the same day resulting in the seizure from the 2291 Pontiac St Parcel #2 of approximately 2,000 grams of suspected fentanyl, although laboratory results are currently pending.

21. **Summary:** In short, over the course of the investigation regarding the above parcels, law enforcement has identified numerous parcels mailed from California to addresses in Ohio in a manner that relate to each other, and bear the indicia of drug trafficking activities. Moreover, with respect to the above packages, JAMES, who is the target of an ongoing narcotics investigation, has been placed at locations relevant to the delivery, or attempted delivery, of suspect packages sent to 944 S. Ohio and 2291 Pontiac. Tying to the present SUSPECT PARCEL, JAMES was the individual, via cameras placed at the USPS location where the SUSPECT PARCEL was sent, who attempted to send the SUSPECT PARCEL. Further, 3072 Niagara Ct. East, Cols, Ohio 43227 is listed as the return address on the SUSPECT PARCEL that JAMES attempted to send. Law enforcement is aware via a public-records check that

JAMES is the current resident and owner of the house located at 3072 Niagara Ct. East, Cols, Ohio 43227. Nevertheless, the named listed with that return address is Nkechi Ojibe, which is not a name otherwise affiliated with that residence. Based upon training and experience, Your affiant respectfully submits that the above information bear indicators of drug trafficking activity, and that, based on the above, there is probable cause to search the SUBJECT PARCEL.

22. In accordance with Title 18, United States Code, Section 3103a(b)(3), I request that the warrant delay notification of the execution of the warrant for 30 days from the execution of the warrant, or until May 26, 2021, because there is reasonable cause to believe that providing immediate notification may have an adverse result, as defined in 18 U.S.C. § 2705. Providing immediate notice would seriously jeopardize the investigation by prematurely revealing its existence and giving suspects an opportunity to flee from prosecution, destroy or tamper with evidence, intimidate potential witnesses, notify confederates, and change patterns of behavior. The United States is still conducting its investigation, and intends to continue its investigation with additional surveillance in California and the Southern District of Ohio.

23. In addition, pursuant to Title 18, United States Code, Section 3103a(b)(2), I request that the warrant prohibit the seizure of “any tangible property, or any wire or electronic communication (as defined in section 2510), or, except as expressly provided in chapter 121, any stored wire or electronic information.” No such property, communications, or information will be seized.

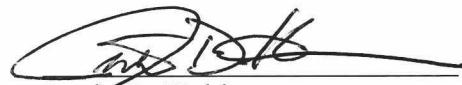
CONCLUSION

24. Based upon the foregoing facts and my training, experience, and expertise as a US Postal Inspector, I submit there is probable cause to search the SUBJECT PARCELS for controlled substances, drug proceeds, and other evidence of violations of Title 21, United States

Code, Sections 841(a)(1), 843(b), and Title 18, United States Code, Section 1716.

25. WHEREFORE, Your affiant respectfully requests that the Court issue a warrant, authorizing agents of the USPIS, including but not limited to other law enforcement agents and technicians assisting in the above-described investigation, to open, view, and photograph the SUBJECT PARCEL and its contents.

26. The above information is true and correct to the best of my knowledge, information, and belief.



Justin D. Koble
US Postal Inspector

Sworn and subscribed to me
This 26th day of April 2021



Kimberly A. Jolson
United States Magistrate Judge

